

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,
Plaintiff,

v.

LYKART TECHNOLOGIES
LLC, ET AL.,
Defendants.

Case No. 3:22-cv-1754-JFS-PJC


Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

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**Supplement to Brief in Opposition (Doc. 120): Submission of Table of Authorities and
Table of Statutes and Rules Pursuant to Local Rule 7.8(a), and Addition of Supporting
Case Law for Claims Under 35 U.S.C. §§ 271(b) and (c)**

Plaintiff respectfully submits this Supplement to the previously filed Brief in Opposition (Doc. 120) to provide the accompanying Table of Authorities and Table of Statutes and Rules, as required by Local Rule 7.8(a). These tables were inadvertently omitted from the original filing. Plaintiff also includes the following two citations, which were inadvertently omitted from the original brief. Federal Circuit authority confirms that claims under 35 U.S.C. §§ 271(b) and (c) do not require the direct infringer to be named. *See* Dynacore Holdings Corp. v. U.S. Philips Corp., 363 F.3d 1263, 1272 (Fed. Cir. 2004) (“There is no requirement that the direct infringer be a party to the suit.”); *In re* Bill of Lading Transmission & Processing Sys. Patent Litig., 681 F.3d 1323, 1336 (Fed. Cir. 2012) (factual allegations of direct infringement are sufficient even if the direct infringer is not named). This addition introduces no new arguments and does not alter any positions previously presented.

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Date July 22, 2025

Respectfully submitted,

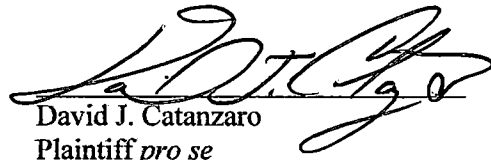


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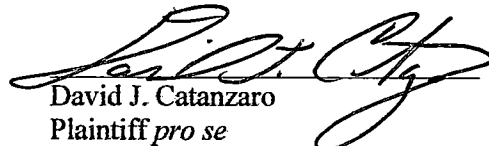
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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2025, I caused a true and correct copy of the foregoing **Supplement to Brief in Opposition (Doc. 120): Submission of Table of Authorities and Table of Statutes and Rules Pursuant to Local Rule 7.8(a), and Addition of Supporting Case Law for Claims Under 35 U.S.C. §§ 271(b) and (c)** to be served via email, in accordance with the parties' agreement for reciprocal email service, to all counsel of record on the docket.

For Unrepresented Defendants: The following two defendants have not appeared in this case and are not represented by counsel. Copies of the foregoing document were served via First Class U.S. Mail to the last known business address shared by both entities: **Lykart Technologies, LLC. and GrowKart**. These defendants are currently in procedural **default**, and Plaintiff reserves the right to move for entry of default as appropriate.

Date July 22, 2025



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